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September 20, 2013

Via ECF

Magistrate Judge James Orenstein
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Phoenix Beverages, Inc. et al. v. Exxon Mobil Corporation, et al.*, C.A. 12-CV-03771 (PKC)(JO); Third-Party Defendant Procter & Gamble Hair Care LLC's Request for Extension of Time to Respond to the Third-Party Complaints of Quanta Resources Corporation and Exxon Mobil Corporation.

Dear Magistrate Judge Orenstein:

I represent Third-Party Defendant Procter & Gamble Hair Care LLC ("Procter") in the above-entitled matter. In accordance with the rules of the Court, Procter respectfully requests an extension of time until October 18, 2013 to answer, move, or otherwise respond to the third-party complaints filed by Third-Party Plaintiffs Quanta Resources Corporation ("Quanta Resources") and Exxon Mobil Corporation ("Exxon"), and served upon Procter on August 27, 2013.

Procter's current deadline to respond is September 20, 2013. Procter has not made any previous requests to extend its period to answer, move, or otherwise respond to the third-party complaints of Quanta Resources and Exxon. Further, this request will not affect any other scheduled deadlines. Finally, Quanta Resources and Exxon have consented to Procter's proposed extension.

Based on the foregoing, Procter respectfully requests that the period within which it must answer, move, or otherwise respond to the third-party complaints of Quanta Resources and Exxon be extended until October 18, 2013.

Respectfully submitted,

A handwritten signature in black ink that reads 'Reed W. Neuman'.

Reed W. Neuman, Esq.

Enclosure
Cc: Counsel of Record (via ECF)